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Attorneys for Defendants: JAMES B. PINTO REVOCABLE TRUST U/A DTD 12/1/03; and JAMES B. PINTO, individually and in his capacity as Grantor and Trustee for the James B. Pinto Revocable Trust

## IN THE UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Appellant,

V.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In Re:

BERNARD L MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

Adv. Pro. No.08-01789 (SMB)

SIPA LIQUIDATION

(Substantially Consolidated)

Adv. Pro. No. 10-04538 (SMB)

v.

JAMES B. PINTO REVOCABLE TRUST U/A DTD 12/1/03; and JAMES B. PINTO, individually and in his capacity as Grantor and Trustee for the James B. Pinto Revocable Trust,

Defendants.

NOTICE OF PRESENTMENT OF ORDER GRANTING MOTION OF DEFENDANTS' COUNSEL ROBERT M. McCLAY AT THE LAW FIRM OF McCLAY•ALTON, P.L.L.P. AND DEFENDANTS' COUNSEL MARVIN C. INGBER FOR AN ORDER PURSUANT TO RULE 2090-1(e) OF THE LOCAL BANKRUPTCY RULES TO REMOVE BRUCE S. SCHAEFFER AS COUNSEL TO DEFENDANTS

PLEASE TAKE NOTICE that upon the annexed motion of Robert M. McClay, McClay•Alton, P.L.L.P. and Marvin C. Ingber, the undersigned will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge, for signature on June 8, 2015 at 12:00 p.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

PLEASE TAKE FURTHER NOTICE that the ECF docket number to which the filing relates shall be included in the upper right corner of the caption of all objections.

Dated: St. Paul Minnesota

April 22, 2015

By: /s/ Robert M. McClay Robert M. McClay #69620 McClay•Alton, P.L.L.P. (Pro Hac Vice) 951 Grand Avenue St. Paul, Minnesota 55101 Telephone: 651-290-0301

Fax: 651-290-2502

Email: law@mcclay-alton.com

Dated: Palm Springs, CA

April 22, 2015

By: /s/ Marvin C. Ingber
Marvin C. Ingber #0048859
(Pro Hac Vice)
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Marvin C. Ingber Attorney and Counselor at Law 337 Westlake Terrace Palm Springs, CA 92264-5534 (Temporarily in Palm Springs, CA for winter)

Attorneys for Defendants: JAMES B. PINTO REVOCABLE TRUST U/A DTD 12/1/03; and JAMES B. PINTO, individually and in his capacity as Grantor and Trustee for the James B. Pinto Revocable Trust To: Bruce S. Schaeffer, Esq.
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